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May 22, 2023

By ECF

Honorable Paul A. Engelmayer
United States District Court
Southern District of New York
40 Foley Square
New York, NY 11201

Re: United States v. Haljoubey Dunlap, 23 Cr. 197 (PAE)

Dear Judge Engelmayer:

I write on consent (Assistant U.S. Attorney Aline Flodr) to respectfully request that the Court adjourn the conference currently scheduled for May 30, 2023, and schedule a change-of-plea hearing for June 5, 2023, at 3:15 p.m., or another time convenient for the Court.

On April 24, 2023, the Court held the initial conference in this matter. At that time, the Court set a deadline of May 30, 2023 for counsel to apprise the Court of any pre-trial motions it planned to file, and a trial date of July 10, 2023. Mr. Dunlap does not intend to file any pre-trial motions, and instead intends to enter a guilty plea pursuant to a *Pimentel* letter provided by the Government. Accordingly, I respectfully request that the Court schedule a change-of-plea hearing. After consulting with Chambers, I respectfully request that it be scheduled for June 5, 2023, at 3:15 p.m., or another time convenient for the Court.

If the Court grants this request, I further request that time be excluded under the Speedy Trial Act until the next conference date.

Respectfully Submitted,

/s/

Martin Cohen
Assistant Federal Defender
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GRANTED. The Court adjourns next week's conference until June 5, 2023, at 3:15 p.m., and excludes time pursuant to 18 U.S.C. 3161(h)(7)(A) for the reasons indicated. The Clerk of Court is requested to terminate the motion at Dkt. No. 21

5/23/2023

SO ORDERED.



PAUL A. ENGELMAYER
United States District Judge